

## REMARKS

Claims 1 and 4-21 were previously pending, of which claim 9 has been canceled; therefore, claims 1, 4-8, and 10-21 are pending. Reconsideration of all pending claims is respectfully requested in light of the foregoing amendments and following remarks.

### **Rejections under 35 U.S.C. § 103**

Claims 1 and 4-8, and 10 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,787,175 (“Carter”) in view of U.S. Patent Publication 2006/0173999 (“Rider”) and further in view of U.S. Patent No. 7,192,195 to Koyama (“Koyama”). Claims 11-21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Carter and Rider.

In response, Applicants respectfully traverse the rejection of the claims on the grounds that the combinations of references are defective in establishing a *prima facie* case of obviousness with respect to all of the claims.

Independent claim 1 recites, *inter alia*:

*determining a second access right for the user;*  
*building a second member definition using the second access right; and*  
*linking the second member definition to a second portion of a document.*

The Examiner will recognize that these elements were previously recited in dependent claim 9, which has been canceled. In addressing claim 9 in the Office action, the Examiner summarily stated that Rider discloses each of these features in paragraphs [0034]–[0035] and [0044] and Figure 4A, which are the same portions of Rider cited by the Examiner as teaching “linking the member definition to a first data portion of a document, wherein the document has the first data portion and a second data portion.”

Assuming *arguendo* that the Examiner’s analysis of the teachings of Rider with respect to “linking the member definition to a first data portion . . .” is correct, the cited portions of Rider clearly fail to teach not one, but two member definitions, each defining an access right for the user, and each associated with a different portion of the document. Stated a different way, the Examiner has failed to show that Rider teaches or suggests two document portions each having a member definition associated therewith. The cited portion of Rider teaches at best a document having two portions, access to one portion of which may be restricted to certain users based on the content thereof.

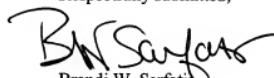
Koyama, newly cited by the Examiner as teaching that the access control is an ACL, fails to remedy the deficiencies of Carter and Rider in this regard.

In view of all of the foregoing, it is apparent that the cited combination fails to teach or suggest the invention as recited in claim 1; therefore, the rejection is not supported by the cited combination and should be withdrawn. Claims 11 and 21 include limitations similar to those of claim 1 and are therefore also deemed to be in condition for allowance for at least the same reasons presented above. Claims 4-8, 10, and 12-20 depend from and further limit claims 1 and 11 and therefore are deemed to be in condition for allowance for at least that reason.

**Conclusion**

It is clear from all of the foregoing that all of the pending claims are now in condition for allowance and prompt notification to that effect is therefore respectfully requested. The Examiner is invited to contact the undersigned at the numbers provided below if further discussion is required.

Respectfully submitted,



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I hereby certify that this correspondence is being filed with the United States Patent and Trademark Office via EFS-Web on the following date.

Date: May 2, 2011  
  
Ellen Lovelace